U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

Revised: September 25, 1982
December 29, 1982*
May 25, 1983*
August 5* 10, 1983*
January 20, 1984 *
July 20, 1984 *
March 19, 1986
4/03/89 *

COPY 12/28/84 ext.

REPLY TO ATTN OF: M/S 533

MAR 25 1982

Chem-Security Systems, Incorporated
Attention: Tom J. McCord, President
P.O. Box 1866
Bellevue, Washington 98009

Dear Mr. McCord:

This is the approval action requested by your firm for the continuation of PCB disposal at Chem-Security's site near Arlington, Oregon.

We are taking this action under the Federal polychlorinated biphenyl regulations published May 31, 1979 in the Federal Register (40 Code of Federal Regulations Part 761.10(e)) promulgated pursuant to the Toxic Substances Control Act of 1976 (Public Law 94-469).

Approval is hereby granted, effective today, subject to the enclosed conditions. It expires January 1, 1985. This approval may be modified, suspended, or revoked if deemed appropriate by the Regional Administrator.

Dated this 25th day of March, 1982.

John R. Spencer
Regional Administrator

Enclosure
12/1/81 submittal for 1/08/82 — Operation Plan (see 4/16/82 for explanation)

See:
4/12/82 - Final Determination document from ERL, Region X.
4/16/82 - The Operation Plan revision document dated 1/08/82 is added as Appendix II of the Letter of Approval issued 3/25/82
4/30/82 - Operation Plan revision 4/30/82 submitted. Note on file copy of submittal letter states "approved verbally."
6/16/82 - Revision 4/30/82 is incorporated into Appendix II. Note clarifying comment.
9/?/82 - Spec. Condition 22 Part C. modified * upper right corner

NOTICE

Pursuant to Section 15(1) and 16(a) of TSCA, (15 USCA §§2614 and 2615(a)) the recipient hereof is advised that penalties not to exceed $25,000 per day may be administratively assessed for any failure to comply with requirements of this document imposed by the authority of, or the regulations prescribed pursuant to, Section 6(e) of the Toxic Substances Control Act (15 USC §2605(e)).

PCB LETTER OF APPROVAL: NEW REQUIREMENTS

DURATION: 3 years - March 25, 1982 to January 1, 1985

OPERATION PLAN (a part of the Approval document):

- waste inspected per written waste acceptance procedures
- PCB receipt status report submitted monthly to DEQ & EPA
- aprons around trench graded to slope away from excavated area
- daily backfill of PCB wastes to depth of 2 feet
- only designated equipment can handle PCBs
- random samples of soil collected from equipment and access roads

IDENTIFICATION OF WASTE:

- PCB concentration, must have -
  (1) written statement signed by generator along with technical justification for determination, or
  (2) laboratory analysis (performed only at EPA qualified lab)
- must itemize contents of containers, & record detailed description
- signed statement by generator or CSSI regarding draining PCB Xfrmrs.

STORAGE: must date all PCB material prior to storage

COMPREHENSIVE TRAINING PROGRAM:

- relevant to position in which employed, to ensure compliance
- written record - topics, names, time, signatures

CLOSURE: final cover to be crowned with 6" coarse gravel

MONITORING:

- must install a NEW observation well in Trench 9
- analyze samples from observation wells if 50cc or more
- if lysimeters show <u>any</u> liquid, must <u>intercept and remove</u> *
- must label residence water well as "office water well"
- must sample groundwater wells for 30 years after closure
- PCB and chlorinated organic analysis must be performed by qualified EPA laboratory

RECORDS: maintain the following written records (20 after closure) -

- laboratory PCB waste analysis results
- Xfrmr. draining certifications
- training records
- laboratory analysis of observation well liquid
- volume and date liquid removed from observation wells
- laboratory groundwater analytical data
- detailed description of wastes (incl. container itemization)
- PCB Xfrmr. label plate data
- data regarding refused PCB shipments
- status of PCB recepits (per operation plan)
- random sampling results (per operation plan)

REPORTING: submit the following reports to EPA -

- detection of PCBs in groundwater (within 48 hours)
- refused PCB shipment data (within 10 days)
- groundwater and observation well data (monthly)
- receipt of spilled material (monthly)
- annual report (annually)

APPROVAL CONDITIONS

Chem-Security Systems, Inc.
PCB Disposal Site
Arlington, Oregon

Administrative Considerations

Pursuant to Section 6(e)(1) of the Toxic Substances Control Act, (Public Law 94-469), regulations were promulgated in Title 40 of the Code of Federal Regulations, Part 761 (44 Federal Register, 31514 et seq.) setting forth the requirements for the formal approval of chemical waste landfills for the disposal of polychlorinated biphenyls (PCBs).

On the basis of the technical report, supporting materials, and site evaluation, and pursuant to the authority of TSCA §6 (e)(1), 40 CFR 761.41(c)(3)(ii), and Special Condition 2 of Part C of the Chem-Nuclear Letter of Approval signed on November 28, 1979, approval has been granted for PCB waste disposal at the Chem-Security Systems, Inc. disposal site identified as the northerly 150 feet of Trench 5 and the westerly 200 feet of Trench 9. This approval, effective today, supercedes and replaces the November 28, 1979 approval (as amended), and is made subject to the requirements and conditions of Part A and C of the enclosed Technical and Operational Requirements. Please note that violation of the requirements and conditions of this Letter of Approval may subject the Company to substantial penalties under the Toxic Substances Control Act.

TECHNICAL AND OPERATIONAL REQUIREMENTS

The pre-existing duty of Chem-Security Systems, Inc., to comply with currently effective PCB regulations promulgated pursuant to T.S.C.A. exists independently from, and in addition to, the Company's duties and obligations set forth in this approval letter. Compliance with currently effective PCB regulations alone does not constitute compliance with this approval letter, nor shall compliance with this approval letter alone be construed to constitute compliance with current regulations. Compliance with currently effective PCB regulations shall not constitute a waiver of any obligations or duties set forth in this approval letter, nor shall this approval letter or compliance with this approval letter constitute a waiver of any obligations or duties under any PCB regulation, unless specifically so stated herein. In cases of conflicts, inconsistencies, or ambiguities, the company may apply in writing to the Regional Administrator for a waiver, modification, or amendment of specific parts or provisions of this approval letter, or for a waiver or modification of the applicability of specific parts or provisions of PCB regulations, which waiver, modification, or amendment may be granted upon a showing of good cause.

40 CFR Part 761, dated May 31, 1979, is attached hereto and is by this reference incorporated herein as Appendix I.

This document sets forth the requirements and conditions, in addition to and in concert with those of 40 CFR Part 761, that must be met to be in compliance with the EPA Region 10 approval for PCB waste disposal at the Chem-Security Systems, Inc., disposal site identified as the northerly 150 feet of "Trench 5" and the westerly 200 feet of "Trench 9" located in Sections 25 T.2N., R.20E.W.M., Gilliam County, Oregon. The report is divided into Parts A, B and C. Part A addresses the tecnhical requirements set forth in Section 761.41(b) and includes a determination of whether some specific requirements have been met. Part B addresses waivers granted for specific technical requirements not met along with rationale for granting the waivers. Part C sets forth Special Conditions that must also be met to remain in compliance with this Letter of Approval.

Part A Technical Requirments

EPA Region 10 has determined that the disposal site has met the technical requirements set forth in Section 761.41(b) of Title 40 unless otherwise indicated. Requirements not met are addressed in the waiver section (Part B).

(1) Chemical Waste Landfill Operations (Section 761.41(b)(8)

(a) PCB Handling (Section 761.41(b)(8)(i))
Requirements--PCBs shall be handled in a manner to prevent damage to containers and must be segregated from wastes which are not chemically compatible with the PCBs or PCB Items.

Determination--These requirements will be met as described in Special Condition 12, 14, 16, and 31 in Part C.

(b) Operation Plan (Section 761.41(b)(8)(ii))
Requirement--An operation plan shall be submitted to EPA for approval.

Determination--Such a plan has been submitted by the applicant Chem-Security Systems, Inc. The provisions of the approved operation plan are incorporated herein by reference and the operating plan is attached to this approval as Appendix II.

(c) Operation Plan (Section 761.41(b)(8)(ii))
Requirement--If the facility is to be used to dispose of liquid wastes containing between 50 ppm and 500 ppm PCB, the operations plan must include procedures to determine that liquid PCBs to be disposed at the landfill do not exceed 500 ppm PCB.

Determination--The Operation Plan as well as Special Condition 8 of Part C address this requirement.

(d) Ignitable Wastes (Section 761.41(b)(8)(iii))
Requirement--Ignitable wastes shall not be disposed of in chemical waste landfills.

Determination--This requirement shall be met for that portion of trenches which are approved for PCB disposal. No ignitable wastes shall be disposed in the remainder of these trenches unless a substantially impermeable dike, having a width of at least 10 feet, is placed between the PCB disposal area and the remainder of the trench.

(e) Records Maintenance (Section 761.41(b)(8)(iv))
Requirement--Records shall be maintained for all PCB disposal operations and must include three-dimensional burial coordinates. Additional records must be maintained as required in Annex VI.

Determination--This requirement will be met. In addition, Special Conditions 28 through 35 of Part C address this and other specific requirements for recordkeeping.

(2) Supporting Facilities (Section 761.41(b)(9))

(a) Fencing (Section 761.41(b)(9)(i))
Requirement--A six-foot woven wire fence shall be provided around the perimeter of the site.

Determination--This requirement shall be met. The "site" is considered to be that area of the facility used presently, or in the past, for disposal.

(b) Road Maintenance (Section 761.41(b)(9)(ii))
Requirement--Access and on-site roads shall be maintained in a safe manner.

Determination--This requirement shall be met as described in Special Condition 18 of Part C.

(c) Site Operations (Section 761.41(b)(9)(iii))
Requirement--The site shall be operated and maintained in a safe manner.

Determination--This requirement will be met.

(3) Synthetic Membrane Liners (Section 761.41(b)(2))
Requirement--synthetic membrane liners shall be used when the hydrologic or geologic conditions at the landfill require such a liner.

Determination--This requirement has been met since the hydrologic or geologic conditions at the landfill do not require such a liner.

(4) Soils (Section 761.41(b)(1))
Requirement--The landfill site shall be located in thick, relatively impermeable formations such as large-area clay pans. Where this is not possible, the regulation specifies technical requirements for in-place soil or a compacted soil liner.

Determination--Although the landfill site is located in a relatively impermeable formation, a charcoal or compacted clay liner shall be placed on the floor of the PCB disposal portion of trenches [see Special Condition (6)].

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(5) Hydrology (leachate collection requirement only) (Section 761.41(b)(3)) and leachate collection (Section 761.41(b)(7)).
Requirement--leachate collection and monitoring system shall be installed.

Determination--The disposal site receives about 10 inches of annual rainfall, but has a pan evaporation of about 63 inches per year. In addition, volcanic tuffs beneath the trenches will act as an absorbing soil column some 200 feet thick to trap fluids that may leak from the PCB disposal trenches. The resulting limited downward movement of water from the trenches should not produce degradation of the regional ground water reservoir because the regional reservoir, located at a depth of more than 500 feet, is protected by layers of relatively impermeable material. 1-20

To further protect against any release from PCB disposal trenches, a leachate collection system shall be installed as described in Special Condition (6)(Part C).

Part B. Waivers of Special Technical Requirements

The following technical requirements under Section 761.41(b) are hereby waived:

(1) Flood Protection Section 761.41(b)(4)
Requirement--For sites located above the 100-year floodwater elevation, diversion structures capable of diverting the surface water runoff from a 24-hour, 25-year storm shall be provided.

Determination--The site is located in the Columbia Plateau basaltic province of north central Oregon and is more than 200 feet above the nearest streambed located in adjacent Alkali Canyon. No flood data is available for this area; however, the disposal site is presumed to be above the 100-year floodwater elevation. Since no runoff occurs in the area of the disposal site, the facility will not be required to construct the specified diversion structures. Occasional rain or snow melt that accumulates in wind-blown depressions either sublimates, evaporates or infiltrates into the shallow soil, usually to be evapo-transpired during the dryer months. Special Condition 7 in Part C addresses the requirement for overland flow diversion.

(2) Monitoring Systems (Section 761.41(b)(6)(i)(C), (ii)(A), & (ii)(B))

(a) Sampling after closure (761.41(b)(6)(i)(C))
Requirement--Defined water sources shall be sampled indefinitely every six months after final closure of the disposal site.

Determination--This requirement is partially waived as sampling every six months for a period of 30 years after final closure of the disposal area is deemed adequate. See Special Condition 26 in Part C.

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(b) Monitor Wells (761.41(b)(6)(ii)(A)
Requirement--Since the underlying earth is impermeable with a uniform slope in one direction, three monitor wells are required that extend from the area of highest water table elevation to the area of lowest water table elevation.

Determination--The ground water occurs under confined conditions at a level at 560 feet below the surface. Therefore, two existing wells will provide adequate monitoring (Part C (26)). Dry wells below the disposal site will monitor the unsaturated material.

Part C. Special Conditions

Definitions

(1) "Disposal" is defined in 40 CFR Part 761.2(h) (incorporated herein by reference). For purposes of this approval, actions related to containing, transporting, decontaminating, or confining PCBs and PCB Items at Chem-Security Systems are not considered disposal per se. Disposal will be limited to actual placement in a disposal facility (i.e., trench), and destroying or degrading (including but not limited to incineration and chemical or biological decomposition) of PCBs or PCB Items.

(2)

(3)

(4)

Special Conditions 2, 3, and 4 are reserved for definitions to be added in the future.

Contractors or Consultants

(5) The names of consultant or contractor firms utilized by Chem-Security Systems in meeting the terms of the Letter of Approval and the regulation must be submitted to the Regional Administrator along with a specification of their authority to act as representatives for Chem-Security Systems. This shall include the names of individuals within the consultant or contractor firm who are authorized to act for Chem-Security Systems in matters delegated to the consultant or contractor firm and the extent of individual responsibility delegated to them by Chem-Security Systems. The document submitted shall be signed by an authorized representative for both Chem-Security Systems and the contracting or consulting firm.

Trench Preparation

(6) The floor of the approved PCB disposal area of trenches (see Special Condition 11 for identification of approved PCB disposal trench areas) shall: (a) be covered with a 1 foot thick layer of charcoal and the charcoal covered with a 1 foot layer of earth prior to placement of PCB wastes, or, (b) be covered with a 1 foot thick layer of compacted clay. A leachate collection system shall be installed above the clay liner which meets the technical and monitoring requirements of 40 CFR Section 761.41(b)(7) and (b)(7)(i). The clay liner and leachate collection system shall be covered with a 1 foot layer of earth prior to placement of PCB wastes. 6/16/8 1-20-

(7) The land surface around the approved PCB disposal area of trenches (i.e., the northerly 150 feet of Trench 5 and the westerly 200 feet of Trench 9) shall be graded, diked, or trenched to prevent any overland surface run-off from flowing into the PCB landfill.

Identification of Waste

(8) (a) Prior to disposal of liquid contaminated by PCBs, the PCB concentration shall be determined. The basis for this determination must be: i) laboratory analysis by an analytical laboratory participating in EPA's Performance Evaluation Sample Program to determine that the ~~liquid~~ contains less than 500 ppm (0.05 percent) PCB; or ii) a written statement by the generator, signed by a responsible individual (i.e., plant manager, owner) that the liquid contains less than 500 ppm (0.05 percent) PCB along with the technical justification for this determination. The disposal of liquids at or above a concentration of 500 ppm (0.05%) PCB at Chem-Security Systems, Inc., is prohibited. Written records of the PCB concentration determination shall be maintained. modif 5-25-8

(b) Prior to stabilization of liquids for disposal, a representative sample shall be collected from each portable tank or other container. [Where the containers are of 55 gallon capacity or less, a representative sample shall be collected from each. Up to a maximum of ten such samples may be combined to form a single composite sample for analysis.] Each of these samples shall be analyzed for PCB concentration (in accordance with (8)(a) i) within 30 days of collection. A written record of analysis results for each sample shall be maintained by Chem-Security Systems and must be available for inspection. Analysis results for each sample must be signed and dated by the individual responsible for the PCB concentration determination. Each sample (and corresponding laboratory analysis) must be recorded in a manner that provides for determining the disposal or storage location of the material sampled. (See Special Condition (37) (b) for reporting requirements. 8-5-8 8-10-8

(9) Shipments received by Chem-Security Systems, Inc. whose descriptions are not consistent (by their appearance or characteristics) with descriptions furnished by the generator or contracting firm must not be disposed until clarification or verification of shipment contents and Chem-Security Systems' authority to dispose are determined. For example, bung top barrels must be assumed to contain liquids, transformers must be assumed to contain PCB liquid, and ring top barrels must be assumed to contain PCB Capacitors unless documentation is furnished which otherwise itemizes the contents of containers and transformers. This documentation must be signed by a responsible individual from the generator firm (i.e., plant manager, owner) and must be maintained by Chem-Security Systems, Incorporated.

(10) Chem-Security Systems, Inc., has no duty or obligation under the law or regulations to accept any shipment of PCB waste sent to it for disposal, and is solely responsible for determining whether or not to accept a shipment, as well as whether or not it may lawfully dispose of a shipment at its approved site.

(11) PCBs, as defined by 40 CFR Section 761.2 (incorporated herein by reference), shall be disposed of as provided by 40 CFR Section 761.10 and conditions of this approval letter. PCBs shall be landfill disposed of only in the northerly 150 feet of Trench 5 located SW 1/4, SE 1/4, Section 25, T. 2 N., R. 20 E.W.M., in the westerly 200 feet of Trench 9 located in SE 1/4, SE 1/4 of same Section 25, and in the southerly 230 feet of Trench 7 located in SW 1/4, SW 1/4, of same Section 25, Gilliam County, Oregon. PCBs received at the Chem-Security Arlington facility shall be stored in compliance with 40 CFR Section 761.42 until disposed of. modif 12-29-8

(12) Except as provided in Special Condition 6 and 22, no materials other than decontaminated transformers, non-liquid PCB's, dredged materials and municiple treatment sludges that contain PCBs, and PCB articles (excluding large PCB capacitors), equipment and containers may be placed in the approved PCB disposal area of trenches (i.e., the northerly 150 feet of Trench 5 and the westerly 200 feet of Trench 9). "Decontaminated transformers" refers to all transformers properly prepared for disposal.

PCB contaminated liquids and mineral oil dielectric fluids which contain a concentration of PCBs less than 500 ppm which have been pretreated and/or stabilized (e.g. chemically fixed, mixed with dry inert absorbant, etc.) such that a non-flowing consistency is achieved shall be considered as non-liquid PCB mixtures for purposes of this Special Condition, and may be disposed in the northerly 150 feet of Trench 5 and the westerly 200 feet of Trench 9. (See Special Condition 8 for verification of concentration.) No other liquids shall be disposed of in the remainder of Trench 5 or Trench 9 unless a substantially impermeable dike, having a width of at least 10 feet, is placed between the PCB disposal area and the remainder of the trench.

(13) PCB Transformers must be drained and rinsed in accordance with 40 CFR Part 761.10(b)(1)(i)(B) prior to disposal. This must be determined and documented by the generator or by Chem-Security Systems, Inc. prior to disposal at Chem-Security Systems. Written records must be maintained by Chem-Security Systems and must be available for inspection. The written records must be signed and dated by the individual responsible for the determination (i.e., generator, plant manager, owner, or Chem-Security System's employee) that the transformers have been drained and rinsed.

(14) PCB shipping containers permanently dedicated and labelled for use solely for shipping PCB articles may be returned for re-use provided that all free flowing liquid is removed and placed in storage and any remaining liquid is removed by absorption onto charcoal or other sorbent, with subsequent disposal of such charcoal or sorbent into an approved PCB disposal area of trenches.

(15) Records required to be maintained by Chem-Security Systems, Incorporated by this approval and the regulations shall be maintained for a period of at least 20 years after the landfill is no longer used for the disposal of PCBs.

(16) In no event shall PCB containers be dumped or pushed into approved PCB disposal trenches from the lip of the trench.

Storage

(17) On occasion, shipments of PCBs for disposal may be received at Chem-Security Systems which cannot be disposed immediately due to lack of documentation, uncertainty of shipment contents, leaking containers, backups at the disposal facility, etc. Therefore, a PCB storage facility complying with 40 CFR Part 761.42(b) shall be maintained at Chem-Security Systems. This facility must be marked in accordance with 40 CFR Part 761.42(c)(3). All PCBs placed in storage, either in the facility or in temporary storage, shall be recorded and dated in accordance with 40 CFR 761.42(c)(8) and 40 CFR 761.45(b) (see Appendix I).

Safety

(18) Roads under the control of Chem-Security Systems, Inc. shall be maintained to and within the site which are adequate to operate and maintain the site without causing safety or nuisance problems or hazardous conditions.

(19) The disposal site shall be operated and maintained in a manner to prevent safety problems or hazardous conditions resulting from spilled liquids or windblown materials.

Training

(20) Chem-Security Systems personnel employed at the Arlington facility must successfully complete a program of on-the-job training that teaches them to perform their duties, relevant to the position in which they are employed, in a way that ensures the facility's compliance with the requirements of this approval and the regulation. Chem-Security Systems, Inc., shall be solely responsible for insuring personnel familiarity with the requirements of this approval and the regulation.

(21) A written record of personnel PCB training shall be maintained. This record shall include: 1) topics covered; 2) individuals conducting the training; 3) time spent in training; 4) participants names and; 5) signature of participants.

Closure

(22) Upon final closure of the approved PCB disposal portion of trenches, they shall be covered with a layer of compacted earth which extends a minimum of 3 feet below the natural land surface or prevailing grade. This cover layer shall be shaped or covered to divert any water away from the trench. Additional measures to prevent the infiltration of water and erosion by wind or water shall be taken as discussed in the submittal to EPA dated July 15, 1982, and attached hereto as Appendix III.

In addition, the following activities shall be conducted:

Modified 9-20-83

a) A routine inspection and maintenance plan and schedule shall be developed and implemented by November 30, 1982 which ensures the integrity of final trench caps and covers. This plan shall be followed by CSSI until such time as the State of Oregon assumes full responsibility for the PCB portion of the disposal trench.

b) The plan required in (22) a) above, shall be submitted to the EPA REgional Administrator no later than December 15, 1982.

c) Where vegetation, as discussed in Appendix III, fails to become established within 1 year of final trench closure or where that vegetation cannot be maintained, a cover of coarse gravel shall be used which is adequate to prevent wind erosion, encroachment by deep rooted vegetation and burrowing by animals.

(23) The trench used for disposal of PCB wastes shall not be reopened after final closure unless written notice is furnished to the Regional Administrator and approval granted prior to the commencement of such activity.

Monitoring

(24) (a) Observation wells shall be installed within the PCB portion of trenches at a site where the bottom of the PCB portion of the trench is at its lowest elevation. These observation wells shall extend to the bottom of the trench and shall be at least 4 inches in diameter and adequately perforated to collect fluids. (A leachate interceptor drain and collection system may be installed for the PCB disposal portion of Trench 5 and may be used in lieu of an observation well in this trench. The drain and system shall be adequate to collect liquids emanating from the PCB disposal portion of Trench 5.) The observation wells in the PCB disposal portion of trenches (and the leachate interceptor drain and collection system for Trench 5) shall be checked monthly for the presence of liquid. If greater than 50 cubic centimeters of liquid is detected, a sample shall be taken and analysed for the following parameters:

1. PCBs
2. pH
3. Specific Conductance
4. Total Organic Halides
5. Chlorides

When monitoring shows that some liquid has accumulated in the bottom of a trench (or in the interceptor drain and collection system), it shall be removed immediately by pumping or bailing. A contemporaneous written record shall be kept of the liquid volume and date of removal. Any liquid removed from the wells (or interceptor drain and collection system) shall be stored pursuant to this approval for subsequent incineration unless tested and found to contain less than 500 ppm PCBs.

(b) A ground water monitoring system shall be established which is adequate to monitor the uppermost aquifer underlying the site. At a minimum, this system shall consist of the following:

(i) Monitoring well MW-1 as constructed and located shall be maintained.

(ii) A monitoring well shall be constructed and maintained along the western perimeter of the facility, north of the bore hole described as B-1 (shown on Attachment B of the technical report submitted March 10, 1978, by Chem-Nuclear Systems, Inc.) but south of the anticline.

(iii) A monitoring well shall be constructed and maintained at a location not more than 150 feet south of Trench 8 in an area near the midpoint of the southern boundary of Trench 8.

3/3/8; modified 8/5/83 1/20/84 2/20/84 3-19-8 3/31/8 3/31 4/3/8

Construction of the wells required under (24)(b)(ii) and (iii) should proceed as described in the RCRA Part B permit application (page F-32, revision 0). In addition, monitoring wells shall be designed, constructed and maintained such that they reach the first monitorable zone. Monitoring wells shall be sampled monthly after construction. Samples shall be analyzed for the parameters listed in Special Condition (24)(a).

The static water level in each monitoring well shall be obtained prior to sampling each month for the first year after well installation and quarterly thereafter.

(25) The two ground water monitor wells (site water well and the office water well) shall be sampled monthly and analyzed for the following parameters:

a. PCBs
b. pH
c. Specific Conductance
d. Total Organic Halides

Samples from each well shall be taken from a point located between the well pump and pressure or storage tanks.

A written record of sampling and laboratory analysis results shall be maintained.

(26) The two ground water wells (the site water well and the office water well) shall be sampled on a frequency of no less than once every six months for a period of 30 years after final closure of the disposal site and the samples analyzed as required in Special Condition 25. A written record of sampling and laboratory analysis results shall be maintained.

(27) Sampling methods and analytical procedures for the parameters required in Special Conditions 24 and 25, excepting total organic halide, shall be as specified in 40 CFR Part 136 as amended in 41 FR 52779 on December 1, 1976. Sampling methods and analytical procedures for total organic halide required in Special Conditions 24 and 25, shall be as specified in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods", EPA Publication SW-846 [Second Edition, 1982 as amended by Update I (April, 1984), and Update II (April, 1985)]. In addition, any laboratory performing chemical (PCBs and total organic halide) tests for the operation of the disposal site shall be a participant in EPA's Performance Evaluation Sample Program for analytical quality control.

Records

(28) Records are an integral part of the approval requirements. The recordkeeping requirements of 40 CFR Part 761 are by this reference incorporated fully herein as part of this approval. Special Conditions 8, 9, 21, 24, 15, and 26 above, contain additional recordkeeping requirements. Other requirements are listed below under this "Records" section.

(29) The annual document (described in 40 CFR Part 761.45(b)) to be prepared by Chem-Security Systems by July 1 of each year, covering the previous calendar year, shall be submitted to: Waste Management Branch, Region 10 EPA,. M/S 533, 1200 Sixth Avenue, Seattle, Washington 98101, by August 1 of each year. This document is a single document and must stand on its own for compliance with the annual document requirement. The submitted annual document must be signed by a responsible individual designated by Chem-Security Systems, dated and labeled as the annual document.

(30) All records shall be maintained in accordance with 40 CFR 761.45(b), (d) and (f), 761.41(b)(8), 761.42(c)(8) and the requirements of this approval.

(31) (a) No PCB wastes, nor wastes or materials of any kind, shall be placed or disposed of in approved PCB disposal trench areas (see Special Condition 11 for identification of approved PCB disposal trench areas) unless a written record of the placing or disposal of such waste or material is made contemporaneously. The exact location of each waste shall be included in the record with respect to a permanent, surveyed reference monument. The specific nature of each waste or material, including whether such waste is a PCB mixture, PCB article, PCB container, or PCB equipment, shall also be included in the record [see Special Conditions (32) and (34) for examples of the level of detail required in describing waste]. Such records shall also include three-dimensional burial coordinates.

modified 6/25/8 5/6/8 8-10-8

(b) The exact location of each PCB disposal unit (that is, area or trench) at the Arlington facility shall be developed and included in facility records in the form of a survey description and drawing with respect to a permanent surveyed reference monument. The descriptions and drawings shall be submitted to the EPA Region 10 Office by August 31, 1983. Survey descriptions and drawings shall be included in applications for new PCB disposal units. Correction of the survey descriptions (if necessary) for new units shall be submitted to EPA Region 10 within 30 days of final unit construction and prior to use for disposal of PCBs.

modif 5-25-8

(32) In accordance with the requirements of Part 761 (Appendix I), descriptions of container and transformer contents in Chem-Security Systems records must specifically identify the type of PCB waste. If more than one type of waste is contained therein, the descriptions must reflect that fact. For example, 'PCB waste' is not an adequate description. At a minimum the waste must be described in terms of the 1) quantity (units and weight); 2) physical state (i.e., liquid, solid); 3) commercial end-use or source and; 4) liquids PCB content in ppm, percent or kilograms per unit volume, prior to disposal. Source documents shall supply the above information and must be retained by Chem-Security Systems. Where those source documents are not adequate, the waste must not be disposed until such documents with adequate descriptions are received or until Chem-Security Systems, Inc. determines container and/or transformer contents and develops a written record which is signed and dated by the individual responsible for making the determination.

For example: 1) 20-55 gallon drums (3500 kg) liquid waste transformer mineral oil dielectric, 125 ppm PCB,

2) 5 yd^3 (24,000 lbs.) solid-waste bulk soil clean-up material from capacitor spill,

3) One 55 gallon drum (50 lbs.) solid-waste PCB, drum empty, triple rinsed.

(33) All data and the results of sampling and analysis shall be recorded in writing contemporaneously, and such written records shall be maintained as specified in 40 CFR 761.45(b).

(34) PCB Transformers must be drained and rinsed in accordance with 40 CFR Part 761.10(b)(1)(i)(B) prior to disposal. This must be determined and documented by the generator or Chem-Security Systems prior to disposal at Chem-Security Systems. Written documentation must be maintained by Chem-Security Systems and be available for inspection. Such documentation shall include the generator's name, transformer manufacturer and serial number (if available), transformer fluid capacity (if available) and the dated signature of the individual responsible for the determination that the transformer was drained and rinsed (i.e., plant manager, owner, Chem-Security Systems employee). "If available" refers to information available from the transformer nameplate or the generator.

(35) Occasionally Chem-Security Systems may refuse to accept shipments arriving at Chem-Security Systems for disposal due to the requirements of the regulation or of this approval. For such shipments, the following shall be recorded: the generator's name, the reason for rejection of the shipment, the date and a description of the waste as stated on the manifest. Copies of those records shall be forwarded to the Waste Management Branch (M/S 533), EPA Region 10 within ten (10) working days of shipment refusal.

Reporting

(36) All monitoring results obtained pursuant to Special Conditions 24, 25 and 26 shall be recorded in writing contemporaneously. Written records shall be submitted monthly for Special Conditions 24 and 25, and promptly after results are obtained (but in no instance later than 90 days after sampling) for Special Condition 26, to the Waste Management Branch, EPA Region 10, M/S 533, 1200 Sixth Avenue, Seattle, Washington 98101. Additionally, the annual document required by Special Condition 29 and such records as are generated pursuant to Special Condition 35, shall be submitted to the same address.

(37) a) The operator of the disposal site shall immediately report to the Regional Administrator any detection of PCB in the samples obtained in compliance with the monitoring requirements of Special Conditions (25) and (26) within 48 hours of receiving such information.

b) If Chem-Security Systems, Inc., believes or has reason to believe that improper disposal or that an environmental release, spill, or other uncontrolled discharge of PCB's has or might have occurred at the facility or during transport, the operator of the disposal site shall inform the EPA Region 10 office within two business days. A written report of the incident shall be submitted to EPA Region 10 within 2 weeks of the incident or of its initial discovery.

(38) Any spilled PCB material received at the site shall be reported on a monthly basis to the Hazardous Wast Branch, EPA Region 10, M/S 533, 1200 Sixth Avenue, Seattle, Washington 98101. The report shall include the spilled material source, specific description of the material, the transporter and the quantity delivered. Such description shall conform to the requirements of Special Conditions 32 and 33.

Access

(39) a) Access to the disposal site during normal working hours for the purpose of EPA inspections and sampling conducted pursuant to Section 11 of the Toxic Substance Control Act shall not be denied.

b) Access to records required by the regulations (40 CFR Part 761) or by this approval during normal working hours for the purpose of EPA inspections and copying shall not be denied.

Duration of Approval

(40) Approval of the above described site shall continue until January 1, 1985, and shall expire on that date unless otherwise extended. The Regional Administrator may act at any time to extend, alter, amend, modify, suspend, or revoke this approval as he deems necessary or appropriate.